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**February 18, 2022**

**Via ECF**

Hon. Anne Y. Shields, USMJ  
United States District Court, EDNY  
100 Federal Plaza,  
Central Islip, NY 11722

**Re: Kerr v. Blade Contracting Inc.**  
Case #: 21-CV-02520 (JS)(AYS)  
Proposed Discovery Plan, etc.

Dear Magistrate-Judge Shields:

My firm represents plaintiff in the above-referenced action, and I respectfully write as per Your Honor's February 4, 2022 order to provide the Court with the attached proposed discovery plan. I provided defense counsel with a copy of these documents today but have not heard back from him by the deadline for filing. As such, we are submitting these on behalf of Plaintiff only.

We thank the Court in advance for its time and consideration.

Respectfully Submitted,

Abdul Hassan Law Group, PLLC

/s/ Abdul Hassan  
By: Abdul K. Hassan, Esq. (AH6510)  
*Counsel for Plaintiff*

**Cc: Defense Counsel via ECF**